

## **EXHIBIT D**

## BakerHostetler

### Baker&Hostetler LLP

45 Rockefeller Plaza  
New York, NY 10111

T 212.589.4200  
F 212.589.4201  
www.bakerlaw.com

Geraldine E. Ponto  
direct dial: 212.589.4690  
gponto@bakerlaw.com

July 25, 2016

### BY E-MAIL

Sara M. DiLeo, Esq.  
Skadden, Arps, Slate, Meagher & Flom LLP  
Four Times Square  
New York, NY 10036-6522  
Sara.DiLeo@skadden.com

Re: *Picard v. Ceretti, et al.*, Adv. Pro. No. 09-01161 (SMB)

Dear Ms. DiLeo:

We received your letter dated July 21, 2016, regarding Tremont Group Holdings' objection to searching for and producing responsive documents in its possession, custody, or control related to the above-referenced proceeding based upon a prior production Tremont made to the Trustee in a separate proceeding. Since receiving your letter, with the assistance of attorneys here who cooperated with your firm on document production in the separate proceeding, I have reviewed the correspondence between our firms detailing the search terms and custodians Tremont used in its prior production. We found your previous search terms completely unrelated to the *Ceretti* proceeding. Apart from Ms. Sandra Manzke, not a single custodian used in your prior search is directly relevant to the *Ceretti* proceeding. Tremont benefited by an approximate 10-year relationship as Co-Manager with Kingate Management Limited for Kingate Global Fund, Ltd. Yet, conspicuously absent from your search terms, for example, was the term, Kingate. And Tremont's prior document production did not include its co-manager agreement or agreements, or any communications between the co-managers. Tremont played a key role in Kingate Global Fund's business, and obtaining relevant documents in Tremont's possession, custody, or control concerning Kingate are crucial to this case moving forward on the timetable fixed by the Court.

Given the dates for a meet and confer that you suggested, we propose meeting at our offices on Wednesday, August 17, 2016 at 2:00 p.m. to discuss this further. Please confirm that date and time.

Sara M. DiLeo, Esq.  
July 25, 2016  
Page 2

In the meantime, to facilitate our discussion on August 17, at a minimum we ask that Tremont search Tremont's documents using the following, relevant names in the *Ceretti* proceeding, and inform us of the hit counts for each:

Ceretti  
Grosso  
Kingate  
FIM  
Wetherhill  
Salahuddin  
BISYS  
Hemisphere  
Citi Hedge  
Thomas Healy  
Tom Healy  
Philip Evans  
Michael Tannenbaum

Sincerely,



Geraldine E. Ponto